

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

9 KINGS HONG KONG LIMITED,

Plaintiff,

v.

Civil Action No. 1:21-cv-03155-CM

BEYOND MASKS, LLC,
SCHIMEON A. FREDERICK, JR., and
JASON MAY,

Defendants.

JOINT STIPULATION

This Stipulation is entered into between Plaintiff 9 Kings Hong Kong Limited (“9 Kings”) and Defendants Beyond Masks, LLC (“Beyond Masks”), Schimeon A. Frederick, Jr. (“Mr. Frederick”), and Jason May (“Mr. May”).

WHEREAS, Plaintiff commenced this action on April 12, 2021 (ECF No. 1);

WHEREAS, Mr. May filed a letter with the Court (ECF No. 30) on May 18, 2021 stating his “wish to contest this court’s jurisdiction over me”;

WHEREAS, on May 19, 2021, this Court issued an Order construing Mr. May’s letter as “a motion to dismiss the complaint for lack of personal jurisdiction over Mr. May and for improper venue, or in the alternative for the transfer of the case insofar as it alleges claims against Mr. May to the Southern District of Florida” (ECF No. 32, at 2);

WHEREAS, the Parties have conferred and have agreed that transfer of this action to the United States District Court for the Southern District of Florida (West Palm Beach Division) is appropriate for the parties’ convenience, is in the interest of justice, and is a venue to which all parties have consented;

WHEREAS, the Parties have further agreed that 9 Kings could have brought this action in the United States District Court for the Southern District of Florida (West Palm Beach Division);

WHEREAS, the Parties have further agreed that venue, personal jurisdiction, and subject-matter jurisdiction over all claims in this action—specifically including all claims against Beyond Masks—are appropriate in the United States District Court for the Southern District of Florida (West Palm Beach Division) and all Parties therefore waive any and all objections to venue, personal jurisdiction, and/or subject-matter jurisdiction in the United States District Court for the Southern District of Florida (West Palm Beach Division);

WHEREAS, the Parties recognize that this Court has authority to transfer this action pursuant to 28 U.S.C. §§ 1404(a), 1406(a), and/or its inherent authority to manage and control its own docket;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of this Court, that:

1. This action shall be transferred to the United States District Court for the Southern District of Florida (West Palm Beach Division).

Dated: June 22, 2021

/s/ Timothy J. Bryant

Timothy J. Bryant (admitted *pro hac vice*)
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Limited*

/s/ James L. Weintraub (with permission)

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LLC, Schimeon A. Frederick, Jr., and Jason
May*